



Graves Garrett LLC

October 11, 2023

Via Electronic Mail Only

The Hon. Maggie Toulouse Oliver
New Mexico Secretary of State
325 Don Gaspar, Suite 300
Santa Fe, NM 87501

New Mexico Department of State
Attn: Bureau of Elections
Sos.elections@state.nm.us

Re: Request for Records Under the National Voter Registration Act

Dear Secretary Toulouse Oliver:

This firm represents Voter Reference Foundation, LLC ("VRF"). VRF hereby requests a copy of the following records pursuant to the National Voter Registration Act, § 20507(i)(1), which requires states to "make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters":

1. The "voter file" for every person registered to vote in New Mexico as of October 11, 2023, as that term is defined in N.M. Stat. § 1-5-2(N), including only first and last name, registered address, date of birth, registration status, vote history, and party affiliation.
2. The "voter file" for every person to whom NVRA notices have been sent under 52 U.S.C. 20507(d)(2), including first and last name and registration address, as of October 11, 2023.

Please provide your response, and any responsive records that are immediately available, within three (3) business days. Please make your production on a rolling basis if necessary.

Please send responses and communications regarding this request to the following address, in electronic form if possible, or to the following mailing address:

edgreim@gravesgarrett.com
Edward D. Greim
Graves Garrett LLC
1100 Main Street, Suite 2700
Kansas City, Missouri 64105

We acknowledge that there is pending litigation between VRF and the Secretary of State; litigation counsel for the Secretary's office, Mark Allen and Jeffer Herrera, are copied on this Letter.

Sincerely,



Edward D. Greim